

## REMARKS

In the Official Action mailed on **08 September 2005** the Examiner reviewed claims 1, 3-16, 18-31, and 33-61. Claims 57 and 60 were rejected under 35 U.S.C. 101 because the claimed invention is directed to non-statutory subject matter. Claims 1, 3-16, 18-31, and 33-61 were rejected under 35 U.S.C. §103 (a) as being unpatentable over Rundensteiner et al, (*Maintaining Data Warehouse over Changing Information Sources*, Communications of the ACM, June 2000, hereinafter "Rundensteiner") in view of Henninger, (USPN 5,499,371, hereinafter "Henninger").

### Rejections under 35 U.S.C. §101

Claims 57 and 60 were rejected because the claimed invention is directed to non-statutory subject matter.

Applicant has canceled claims 57 and 60 without prejudice.

### Rejections under 35 U.S.C. §103(a)

Independent claims 1, 16, 31, 47, and 56-61 were rejected as being unpatentable over Rundensteiner in view of Henninger.

Applicant respectfully points out that the combined system of Rundensteiner and Henninger teaches a method that limits the interaction between an application and a database or data store in a manner where **only the application has knowledge and control** over the communication process between the application and the database and the conversion process between the original data format and an object model (see Rundensteiner, page 57, bullets 1-2, and see Henninger, column 3, lines 2-11). As a result, the conversion process is limited to be unidirectional.

In contrast, the present invention teaches a mapping process that can map **between a markup language document and an object model**. More

specifically, the present invention facilitates mapping a **markup language document to an object model**, or vice versa, **that allows mapping an object model to a markup language document** (see page 2, lines 15-29 of the instant application). Thus, unlike Rundensteiner and Henninger, the present invention teaches a method where the mapping process is bidirectional and where either the application (utilizing a markup language document format) or an application (utilizing an object model format) can have knowledge and control over the data conversion process. This is advantageous because it provides greater flexibility in data manipulation and thus, benefits a greater number of applications. Additionally, unlike Henninger, the present invention is applicable to all applications and is not limited only to databases.

Accordingly, Applicant has amended independent claims 1, 56, and 58 for clarification purposes in support of the above arguments. These amendments find support on page 2 of the instant application. Independent claims 16, 59, and 61 have been canceled without prejudice.


Additionally, independent claims 31 and 47 have been amended similarly to the amendment made to independent claim 1.

Hence, Applicant respectfully submits that independent claims 1, 31, 47, 56, and 58 as presently amended are in condition for allowance. Applicant also submits that claims 3-15 and 18-30, which depend upon claim 1, claims 33-46, which depend upon claim 31, and claims 48-55, which depend upon claim 47, are for the same reasons in condition for allowance and for reasons of the unique combinations recited in such claims.

**CONCLUSION**

It is submitted that the present application is presently in form for allowance. Such action is respectfully requested.

Respectfully submitted,

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